

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LBS INNOVATIONS, LLC,

Plaintiff,

V.

BP AMERICA, INC., *et al.*,

Defendant.

LBS INNOVATIONS, LLC,

Plaintiff,

V.

MARRIOTT INTERNATIONAL, INC.,

Defendant.

Civil Action No. 2:11-cv-00407-JRG-RSP
CONSOLIDATED
Lead Case

Jury Trial Demanded

Civil Action No. 2:13-cv-00159-JRG-RSP
CONSOLIDATED

Jury Trial Demanded

**PLAINTIFF LBS INNOVATIONS, LLC AND DEFENDANT MARRIOTT
INTERNATIONAL, INC.'S STIPULATED MOTION FOR DISMISSAL**

Plaintiff LBS Innovations, LLC (“LBSI”) and Defendant Marriott International, Inc. (“Marriott”), pursuant to Fed. R. Civ. P. 41(a)(2), hereby move for an order dismissing all claims against Marriott WITH PREJUDICE (noting that no counterclaims have been filed by Marriott against LBSI), with each Party to bear its own costs, expenses, and attorneys’ fees.

Dated: April 5, 2013

Respectfully submitted,

BUETHER JOE & CARPENTER, LLC

CROWELL & MORING LLP

By: /s/ Niky Bukovcan
Christopher M. Joe (Lead Counsel)
State Bar No. 00787770
Chris.Joe@BJCIPLaw.com
Eric W. Buether
State Bar No. 03316880
Eric.Buether@BJCIPLaw.com
Brian A. Carpenter
State Bar No. 03840600
Brian.Carpenter@BJCIPLaw.com
Niky Bukovcan
State Bar No. 24078287
Niky.Bukovcan@BJCIPLaw.com

/s/ John L. Cuddihy
John L. Cuddihy (Admitted E.D. Tex.) (Lead Counsel)
jcuddihy@crowell.com
Brian M. Koide (Admitted E.D. Tex.)
bkoide@crowell.com

1001 Pennsylvania Avenue, NW
Washington, DC 20004-2595
Telephone: (202) 624-2500
Facsimile: (202) 628-5116

POTTER MINTON P.C.

Michael E. Jones (State Bar No. 10929400)
mikejones@potterminton.com
Allen F. Gardner (State Bar No. 24043679)
allengardner@potterminton.com

110 N. College Avenue, Suite 500
Tyler, Texas 75702
Telephone: (903) 597-8311
Facsimile: (903) 593-0846

**ATTORNEYS FOR PLAINTIFF
LBS INNOVATIONS, LLC
("LBSI")**

**ATTORNEYS FOR DEFENDANT
MARRIOTT INTERNATIONAL, INC.
("MARRIOTT")**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a) on this 5th day of April, 2013. Any other counsel of record will be served by facsimile transmission.

/s/ Niky Bukovcan
Niky Bukovcan